REMARKS

By this amendment, Claims 1-23 have been cancelled. Claims 24-48 have been added. Hence, Claims 24-48 are pending in the application.

SUMMARY OF THE REJECTIONS

Prior Claims 1, 3-8, 11-18 and 21-22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,671,063 to Iida ("*Iida*"), in view of U.S. Patent No. 5,983,200 to Slotznick ("*Slotznick*"). Prior Claims 9 and 19 stand rejected as being unpatentable over *Iida* and *Slotznick*, further in view of U.S. Patent No. 6,452,692 to Yacoub ("*Yacoub*"). Prior Claims 10 and 23 are rejected as being unpatentable over *Slotznick*, further in view of U.S. Patent No. 6,823,172 to Forrest ("*Forrest*"). Prior Claims 2 and 13 were canceled.

The rejections are respectfully traversed.

EACH OF THE PENDING CLAIMS IS PATENTABLE OVER THE CITED ART

Even if the cited references were to be properly combined, each of the new claims features at least one element that is not disclosed, taught, or suggested by the cited art, either taken individually or in combination.

Claim 24

New independent Claim 24 features:

A printing interface apparatus comprising:

- a wireless interface configured to receive electronic document information from a wireless device over a wireless connection, wherein the electronic document information is associated with one or more electronic documents and comprises non-print ready data;
- a web server configured to dynamically generate web page data that can be processed by a web browser for display on the wireless device, wherein the web page data is generated by the web server based on the received electronic document information;

a printer driver configured to process the electronic document information and generate print ready data based on at least the non-print ready data in the electronic document information; and

wherein the printing interface apparatus is configured to transmit the print ready data to a printing device over a communications link.

Claim 24 describes an apparatus for receiving electronic document information comprising non-print ready data from a wireless device, generating web page data, based on the electronic document information, capable of being displayed on the wireless device, generating print ready data based on at least the non-print ready data in the electronic document information, and transmitting the print ready data to a printing device.

The apparatus of Claim 24 is a wholly-contained intermediate device, separate from the printing device, that is capable of receiving non-print ready data from a wireless device and transmitting print ready data generated based on at least the non-print ready data to a separate printing device over a communications link.

The Office Action asserts that no teaching and/or terms relating to "non-print ready" are found within any portion of the Specification. As described herein, the electronic document information sent from the wireless device must necessarily be "non-print ready" because the wireless device 332 does not include a printer driver, as detailed at page 12, lines 15-16 of the Specification. Furthermore, the purpose of printer driver 350 is to generate print ready data. Specification at page 13, lines 10-20.

The Office Action also asserts that no teaching of a "web server application configured to receive non-print ready electronic document information to print ready file [sic]" is found in the original filed Specification. New Claim 24 obviates this assertion.

Further, the Office Action asserts that none of the figures show any reference to "web server application 352."

This is resolved by the Amendment and Response filed on July 15, 2005 and this Amendment, because the sentence referred to by the Office Action now reads

Further to this example, interface box 334 includes a wireless interface 344, a web server 346, a printer driver 350 and an Ethernet interface 356.

The Office Action asserts that the network facsimile apparatus 201 of *Iida* teaches a web server application configured to receive non-print ready electronic document information. Specifically, Page 2 of the Office Action asserts that Col. 4, lines 35-58 of *Iida* teach this limitation. However, the cited section of *Iida* only teaches that a "file providing section 35 receives a file, whose file request is provided from client machine 202, from file management section 36 to provide to WWW server communication section 31." *Iida*, Col. 4, lines 48-52. *Iida* does not teach receiving *non-print ready* document information. On the contrary, *Iida* teaches at Col. 6, lines 18-28:

A printer driver for using the network facsimile apparatus as a printer is installed in advance at client machine 202.... When printer 2 is selected and determine-button 52 is selected, the printer driver for using the network facsimile apparatus as a printer is started.

Iida teaches that the printer driver on the client machine is used to generate a print ready file that is sent to the WWW server. In contrast, Claim 24 recites receiving non-print ready document information at the wireless interface, and a printer driver configured to process the electronic document information and generate print ready data based on at least the non-print ready data in the electronic document information. As shown in the embodiment of Fig. 3B, the wireless device 332 does not include a printer

driver. The electronic document information sent from the wireless device to the interface box 330 is therefore not "print ready."

On page 8, the Office Action states

[a] web server application is a computer-software and a web server is a hardware device....

However, none of the figures show any reference to web server application 352. Herein, the examiner interprets web server application as "WWW server section 12" as shown in fig. 2 & 4 by *Iida*.

The issue of the figures not showing any reference to web server application 352 has been clarified, as discussed above. Regarding the examiner's distinction between software and hardware, Applicant makes no such distinction. Claim 24 discloses a web server

[c]onfigured to dynamically generate web page data that can be processed by a web browser for display on the wireless device, wherein the web page data is generated by the web server based on the received electronic document information; ...

This is not the "web server" taught by *Iida*, which merely "[enables] the bulletin board to be browsed." *Iida*, col. 2, lines 30-31. *Iida* does not teach, suggest or disclose a web server configured to dynamically generate web page data based on electronic document information comprising non-print ready data.

As explained above, at least one element of Claim 24 is not disclosed, taught, or suggested by *Iida* or *Slotznick*, either individually or in combination. Further, *Iida* and *Slotznick* have not been properly combined. Consequently, it is respectfully submitted that Claim 24 is patentable over the cited art and is in condition for allowance.

Claim 38

New independent Claim 38 features:

A printing interface apparatus comprising:

a wireless interface configured to receive electronic document information from a wireless device over a wireless connection, wherein the electronic document information is associated with one or more electronic documents and comprises non-print ready data;

a web server configured to dynamically generate web page data that can be processed by a web browser for display on the wireless device, wherein the web page data is generated by the web server based on the received electronic document information;

a printer driver configured to process the electronic document information and generate print ready data based on at least the non-print ready data in the electronic document information:

wherein the printing interface apparatus is configured to transmit the print ready data to a printing device over a communications link; and

wherein the printing interface apparatus is shielded to limit wireless transmission of data to an area substantially in front of the printing interface apparatus.

No cited portions of *Forrest* or *Slotznick* are cited to show any suggestion, teaching, or motivation to combine their teachings. The Office Action merely states an assumed advantage of an abstract combination of various elements referenced by *Forrest* and *Slotznick*. This does not provide a "clear and particular" showing of the suggestion, teaching, or motivation to combine their teachings.

It is respectfully submitted that such a hindsight observation is not consistent with the Federal Circuit's requirement for "particular factual findings."

As explained above, at least one element of Claim 38 is not disclosed, taught, or suggested by *Forrest* or *Slotznick*, either individually or in combination. Further, *Forrest*

and *Slotznick* have not been properly combined. Consequently, it is respectfully submitted that Claim 38 is patentable over the cited art and is in condition for allowance.

Claims 40 and 42

Claims 40 and 42 are new independent Claims, each of which introduces one or more additional limitations already discussed with regard to new independent Claims 24 and 38 that independently render it patentable. Due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time, although the Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

Claims 25-37, 39, 41, 43-48

Claims 25-37, 39, 41, 43-48 are dependent claims, each of which depends (directly or indirectly) on one of the claims discussed above. Each of Claims 25-37, 39, 41, 43-48 is therefore allowable for the reasons given above for the claim on which it depends. In addition, each of Claims 25-37, 39, 41, 43-48 introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time, although the Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

The fee for the one-month extension of time under 37 C.F.R. § 1.17(a) accompanies this response. To the extent necessary, a petition for any further extensions of time under 37 C.F.R. § 1.136 is hereby made. Please charge any necessary fees shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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